



**U.S. Department of Justice**

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April 23, 2024

**VIA ECF**

The Honorable Esther Salas  
United States District Judge  
Martin Luther King Building & U.S. Court House  
50 Walnut Street  
Newark, New Jersey 07101

Re: *United States v. Anyco International, Inc.*  
Criminal Number: 2:23-cr-00419 (ES)

Dear Judge Salas:

I am an Assistant United States Attorney assigned to the Asset Recovery Money Laundering Unit and I am responsible for the enforcement and collection of the restitution that was ordered in the above-referenced case. The United States respectfully submits this letter to advise the Court of two developments in this matter.

First, as the Court is aware, the Government filed an Application for a turnover order on February 15, 2024. ECF Dkt. No. 12. On March 4, 2024, the Court issued a text order granting Anyco until March 22, 2024, to respond to the application. ECF Dkt. No. 13. As of the date of this letter, Anyco has neither responded to the application order nor requested additional time to do so.

Second, recent developments in the related civil matter may jeopardize the Government's ability to recover the funds at issue here. *See Anyco Int'l Inc v. Cha*, Civil Action No. 18-5759 (PGS) ("Civil Matter"). The Government's Application was prompted by orders issued by the Honorable Peter G. Sheridan in the Civil Matter. Specifically, the Civil Matter is a lawsuit in which Anyco is suing a former employee, Yang Sup Cha. In the Civil Matter, Judge Sheridan directed Mr. Cha to deposit funds with the Court pending the outcome of the litigation. ECF Dkt. No. 18. On February

15, 2024, Judge Sheridan entered judgment in that case and ordered, *inter alia*, that the funds deposited with the Court rightfully belong to Anyclo. ECF Dkt. Nos. 110, 111. On April 22, 2024, Judge Sheridan issued a text order to directing Anyclo's counsel to provide certain information to the Clerk's Office to facilitate the disbursement of those funds. ECF Dkt. No. 114.

Based on the foregoing, the United States respectfully requests that the Court either enter the proposed Turnover Order so that \$176,712.35, plus any accrued interest, can be applied against the Defendant's restitution obligation previously imposed by the Court or, alternatively, stay the Court Clerk from distributing the funds until the Court makes a final determination on the Government's Application.

Thank you for your consideration in this matter.

Respectfully submitted,

PHILIP R. SELLINGER  
United States Attorney

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